



Northwest Concrete Masonry Association

October 5, 2009

Mr. Peter DeVries, Chair
Washington State Building Code Council
PO Box 42525
Olympia, WA 98504-2525

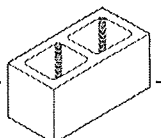
Mr. Chairman and Council Members:

I am Tom Young with the Northwest Concrete Masonry Association. Hopefully, you recall my previous testimony in opposition to portions of the most recent version of proposed energy code amendment Log # 09-031. This amendment includes major changes to provisions for mass wall (masonry and concrete) construction in nonresidential buildings. Today I want to provide you with more detailed information regarding the proposal and the potential negative impact of this proposal upon the masonry industry.

This amendment prohibits the common use of integrally insulated single-width concrete masonry block walls where insulation is placed inside the wall in the open cells. It would most likely require framing and insulation to be added to the wall on the interior. This eliminates or diminishes many of the sustainable properties of the block wall including durability, fire safety, VOC reduction, and mold/mildew resistance. If a frame wall must be constructed behind the structural block wall it is an inefficient use of building materials, increases cost, and disadvantages our industry. Furthermore, the R-value and U-value requirements of the proposed amendment do not equate to those of real-world buildable masonry walls.

The need for this amendment has not been substantiated by the proponent. Energy modeling studies we have conducted conclude that the proposal is not cost-effective for a typical concrete masonry nonresidential building. The high cost of adding the insulated frame wall to the masonry wall interior is not recovered in energy savings over any reasonable period of time with some pay-back periods greater than 100 years. Cost-effectiveness is a required consideration for state energy code change as stated in WA. RCW 19.27A.025.

In addition, the economic impact of this amendment has not been considered. I attended the Energy TAG meetings and was told cost impacts would be addressed at the Economic Assessment Committee. At their June meeting the Economic committee sent my issue back to the Energy TAG where no further discussion took place. We believe the economic impact to be very significant with increased construction costs near 5 percent. The required amount of time should be taken to properly address our concerns prior to adopting restrictive code requirements impacting our industry.



In summary, the proposed amendment to the mass wall requirements would have a detrimental impact upon the concrete masonry industry without adequate justification. Further study of this issue should be done, including economic impacts, prior to making code changes. Better solutions can be developed for concrete masonry wall systems balancing energy efficient commercial building design with associated construction cost impacts. For this code cycle we support maintaining the current mass wall energy code provisions which provide greater design flexibility and cost-effectiveness for the concrete masonry wall systems used in nonresidential construction.

Thank you for the opportunity to speak today.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Young', with a large, stylized loop at the end.

Thomas C. Young, PE
Executive Director